

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
10

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

**DECLARATION OF CHRISTOPHER  
CHIOU IN SUPPORT OF OMNIBUS  
SEALING STIPULATION  
REGARDING DKT. NOS. 2212 AND  
2213**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

16  
17  
18  
19 I, Christopher Chiou, declare as follows:

20 1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney  
21 of record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in *In Re:*  
22 *Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.:  
23 4:22-md03047-YGR. I am licensed to practice law in the state of California and am admitted to  
24 practice before this Court. I submit this declaration in support of the Omnibus Sealing  
25 Stipulation in connection with the Parties’ Joint Letter Brief re YouTube’s Search and  
26 Production from Noncustodial Source “B” (ECF No. 1974). I have personal knowledge of the  
27 facts set forth in this declaration, and I could and would testify competently to their truth if called  
28 upon to do so.

2. On August 25, 2025, the Parties filed the Parties' Stipulation re YouTube Noncustodial Sources (ECF No. 2212) and Attachments 1-11 filed under seal (ECF No. 2213).

3. I have reviewed the documents that YouTube seeks to seal pursuant to the Court's Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on my review of the documents and in consultation with YouTube, I understand there is good cause to seal the following information:

Dkt. No.	Description	Basis for Sealing
2213-1	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit A	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the F Source repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
2213-2	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit A-1	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the F Source repository searchability, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
2213-3	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit B	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the L Source repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
2213-4	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit B-1	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the L Source repository searchability, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
2213-5	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the A Source repository, and tool design, as well as

1		from Non-Custodial Sources, Exhibit C	user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
2			
3			
4	2213-6	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit D	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the B Source repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
5			
6			
7			
8			
9	2213-7	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit D-1	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the B Source repository searchability, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
10			
11			
12			
13			
14	2213-8	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit E	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the M Source repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
15			
16			
17			
18			
19	2213-9	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit E-1	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the M Source repository searchability, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
20			
21			
22			
23			
24	2213-10	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit F	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the C Source repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
25			
26			
27			
28			

2213-11	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibits F-1	The sealed attachment consists of sensitive and confidential information about YouTube's platform, the C Source repository searchability, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
---------	--	--

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on September 8, 2025.

/s/ Christopher Chiou  
Christopher Chiou